

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

ABRAHAM VEGA VEGA	*	19-06011-EAG
IRIS BETSY VELEZ MORALES		
Debtor	*	CHAPTER 13

**MOTION REQUESTING TO
WITHDRAW AS ATTORNEY OF RECORD**

TO THE HONORABLE COURT:

Comes now, debtor Abraham Vega Vega and spouse through their undersigned attorney and very respectfully ALLEGES and PRAYS to this Honorable Court as follows:

- 1) In the above captioned case, conflicts between counsel and debtors have affected counsel-debtor relationship.
- 2) The appearing counsel request that the Court allow us to withdraw, and Debtors be allowed additional time to procure new legal representation.
- 3) Debtors have been advised to immediately procure their legal file as to continue with the proceedings and hire new legal representation and to properly answer any pending motions and / or contested matters.
- 4) Debtors are aware of the pending issues on the case including pending objection to confirmation of the plan dated August 28,2020.
- 5) Furthermore, we request that all motions, order's or notices be sent to the debtors to the following address: Calle Marginal Numero 33, Barrio Maginas, Sabana Grande, PR 00637, until debtor appears with new counsel.

NOTICE

14 Day Notice to all creditors and parties in interest: You are hereby notified that you have fourteen (14) days from the date of this notice to file an opposition to the foregoing motion and to request a hearing. If no opposition is filed within the prescribed period of time, the debtors motion will be deemed unopposed and may be granted without further hearing unless: 1) the requested relief is forbidden by law; 2) the requested relief is against public policy; 3) in the opinion of the Court, the interest of justice requires otherwise. If a timely opposition is filed, the court will schedule a hearing as a contested matter.

WHEREFORE; pray the Honorable Court grant us withdrawal as counsel in the case on hand and that the Court grant the debtors thirty (30) days to secure and announce new legal representation.

CERTIFICATION: I hereby certify that on 10/09/2020, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Trustee assigned to the case, and I hereby certify that I have mailed by the United States Postal Service the document to the following non CM/ECF participants: all CREDITORS IN THE MASTER MAILING LISTING including debtor's address at Calle Marginal Numero 33, Barrio Maginas, Sabana Grande, PR 00637.

In Mayaguez, Puerto Rico on this day 10/09/2020.

SIGNED: /s/LIRIO DEL MAR TORRES
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